Instructions for Using the Plan Review Crosswalk for Review of Local Mitigation Plans

Attached is a Plan Review Crosswalk based on the *Multi-Hazard Mitigation Planning Guidance Under the Disaster Mitigation Act of 2000*, published by FEMA, dated March 2004. This Plan Review Crosswalk is consistent with 44 CFR Part 201 – Mitigation Planning, Interim Final Rule (the Rule), in accordance with the Stafford Act (42 U.S.C. 5165), and 44 CFR Part 78.5 – Flood Mitigation Plan Development, in accordance with the National Flood Insurance Act of 1968 (42 U.S.C. 4104c et seg).

SCORING SYSTEM

- N Needs Improvement: The plan does not meet the minimum for the requirement. Reviewer's comments must be provided.
- S Satisfactory: The plan meets the minimum for the requirement. Reviewer's comments are encouraged, but not required.

Each requirement includes separate elements. All elements of a requirement must be rated "Satisfactory" in order for the requirement to be fulfilled and receive a summary score of "Satisfactory." A "Needs Improvement" score on elements shaded in gray (recommended but not required) will not preclude the plan from passing.

When reviewing single jurisdiction plans, reviewers may want to put an N/A in the boxes for multi-jurisdictional plan requirements. When reviewing multi-jurisdictional plans, reviewers may want to put an N/A in the prerequisite box for single jurisdiction plans.

States that have additional requirements can add them in the appropriate sections of the *Multi-Hazard Mitigation Planning Guidance* or create a new section and modify this Plan Review Crosswalk to record the score for those requirements.

Optional matrices for assisting in the review of sections on profiling hazards, assessing vulnerability, and identifying and analyzing mitigation actions are found at the end of the Plan Review Crosswalk.

The example below illustrates how to fill in the Plan Review Crosswalk.

Example

Assessing Vulnerability: Overview

• Multihazard Requirement \$201.6(c)(2)(ii): [The risk assessment shall include a] description of the jurisdiction's vulnerability to the hazards described in paragraph (c)(2)(i) of this section. This description shall include an overall summary of each hazard and its impact on the community.

FMA Requirement §78.5(b): Description of the existing flood hazard and identification of the flood risk,, and the extent of flood depth and damage potential.

	Location in the			SCO	RE	
	Plan (section or		Sta	afford	FI	MA
Element	annex and page #)	Reviewer's Comments	N	S	N	S
Does the plan include an overall summary description of the jurisdiction's vulnerability to each hazard?	Section II, pp. 4-10	The plan describes the types of assets that are located within geographically defined hazard areas as well as those that would be affected by winter storms.		✓		✓
B. Does the plan address the impact of each hazard on the jurisdiction?	Section II, pp. 10- 20	The plan does not address the impact of one of the five hazards addressed in the plan. Required Revisions: Include a description of the impact of earthquakes on the assets. Recommended Revisions: This information can be presented in terms of dollar value or percentages of damage.	>			✓
		SUMMARY SCORE	✓			✓

Local Mitigation Plan Review and Approval Status

Jurisdiction:	Title of Plan:		Date of Plan:
McCone County	McCone County CV	/PP/PDM Plan	December 2005
Local Point of Contact:		Address:	
Mistica Hisdahl			
Title:	itle:		
McCone County Disaster and Em	ergency Services Coordinator	Circle, MT 59215	
Agency:			
McCone County			
Phone Number:		E-Mail:	
406-485-2851, (cell) 975-3505			

State Reviewer:	Title:	Date:
Kent Atwood	SHMO	July 20, 2006

FEMA Reviewer:	Title:	Date:
KC Collins	Planner	October 5, 2006
Wade Nofziger	Mitigation Specialist	October 6, 2006
Diana Heyder	Mitigation Specialist	October 16, 2006
Date Received in FEMA Region VIII	July 24, 2006	
Plan Not Approved		
Plan Approved	xxx	
Date Approved	November 13, 2006	

	NFIP Status*					
Jurisdiction:	Y	N	N/A	CRS Class		
1. McCone County (never mapped)		X				
2. Town of Circle (Good Standing – mapped 4/15/86)	X					
5. [ATTACH PAGE(S) WITH ADDITIONAL JURISDICTIONS]						

^{*} Notes: Y = Participating

N = Not Participating

N/A = Not Mapped

LOCAL MITIGATION PLAN REVIEW SUMMARY

The plan cannot be approved if the plan has not been formally adopted.

Each requirement includes separate elements. All elements of the requirement must be rated "Satisfactory" in order for the requirement to be fulfilled and receive a score of "Satisfactory." Elements of each requirement are listed on the following pages of the Plan Review Crosswalk. A "Needs Improvement" score on elements shaded in gray (recommended but not required) will not preclude the plan from passing. Reviewer's comments must be provided for requirements receiving a "Needs Improvement" score.

SCORING SYSTEM

Please check one of the following for each requirement.

- N Needs Improvement: The plan does not meet the minimum for the requirement. Reviewer's comments must be provided.
- **S Satisfactory:** The plan meets the minimum for the requirement. Reviewer's comments are encouraged, but not required.

Prerequisite(s) (Check Applicable Box)	STAFFORD FMA		<u>A</u>	
	NOT MET	MET	NOT MET	MET
Adoption by the Local Governing Body: §201.6(c)(5) and §78.5(f)		N/A		N/A
OR				
Multi-Jurisdictional Plan Adoption: §201.6(c)(5) and and §78.5(f) AND		Х		Х
Multi-Jurisdictional Planning Participation: §201.6(a)(3) and and §78.5(a)		Х		Х
Planning Process	N	s	N	S
Documentation of the Planning Process: §201.6(b) and §201.6(c)(1) and §78.5(a)		Х		Х
Risk Assessment	N	S	N	S
Identifying Hazards: §201.6(c)(2)(i) and §78.5(b)		Х		Χ
Profiling Hazards: §201.6(c)(2)(i) and §78.5(b)		Х		Х
Assessing Vulnerability: Overview: §201.6(c)(2)(ii) and §78.5(b)		х		Х
Assessing Vulnerability: Identifying Structures: §201.6(c)(2)(ii)(A) and §78.5(b)	X			N/A
Assessing Vulnerability: Estimating Potential Losses: §201.6(c)(2)(ii)(B)	X		X	
Assessing Vulnerability: Analyzing Development Trends: §201.6(c)(2)(ii)(C)		Х		Х
Multi-Jurisdictional Risk Assessment: §201.6(c)(2)(iii) and FEMA 299		Х		Х

Mitigation Strategy

Local Hazard Mitigation Goals: §201.6(c)(3)(i) and §78.5(c)

Identification and Analysis of Mitigation Actions: $\S 201.6(c)(3)(ii)$ and $\S 78.5(d)$

Implementation of Mitigation Actions: §201.6(c)(3)(iii) and §78.5(d) and (e) Multi-Jurisdictional Mitigation Actions:

§201.6(c)(3)(iv) and FEMA 299

Plan Maintenance Process

Monitoring, Evaluating, and Updating the Plan: §201.6(c)(4)(i) and §78.5(e)

Incorporation into Existing Planning Mechanisms: §201.6(c)(4)(ii)

Continued Public Involvement: §201.6(c)(4)(iii)

STAFF	ORD	FN	<u> 1A</u>
N	S	N	S
	Х		X
	х		Х
	Х		X
	Х		X

STAF	ORD	FN	<u>1A</u>
N	S	N	S
	Х		Х
	Х		Х
	Х		Х

LOCAL MITIGATION PLAN APPROVAL STATUS

PLAN NOT APPROVED

STAFFORD FMA

XXX XXX

PLAN APPROVED

*States that have additional requirements can add them in the appropriate sections of the *Multi-Hazard Mitigation Planning Guidance* or create a new section and modify this Plan Review Crosswalk to record the score for those requirements.

See Reviewer's Comments

PREREQUISITE(S)

Adoption by the Local Governing Body

- Multihazard Requirement §201.6(c)(5): [The local hazard mitigation plan shall include] documentation that the plan has been formally adopted by the governing body of the jurisdiction requesting approval of the plan (e.g., City Council, County Commissioner, Tribal Council).
- FMA Requirement §78.5(f): Documentation of formal plan adoption by the legal entity submitting the plan (e.g., Governor, Mayor, County Executive).

				SCO	RE	
	Location in the		STAFF	ORD	FN	/IA
Element	Plan (section or annex and page #)	Reviewer's Comments	NOT MET	MET	NOT MET	MET
A. Has the local governing body adopted the plan?	N/A					
B. Is supporting documentation, such as a resolution, included?	N/A					
		SUMMARY SCORE		N/A		N/A

Multi-Jurisdictional Plan Adoption

- Multihazard Requirement §201.6(c)(5): For multi-jurisdictional plans, each jurisdiction requesting approval of the plan must document that it has been formally adopted.
- FMA Requirement §78.5(f): Documentation of formal plan adoption by the legal entity submitting the plan (e.g., Governor, Mayor, County Executive).

				SCO	RE	
	Location in the		STAFF	ORD	F۱	/IA
Element	Plan (section or annex and page #)	Reviewer's Comments	NOT MET	MET	NOT MET	MET
A. Does the plan indicate the specific jurisdictions represented in the plan?	Page vii	McCone County and the Town of Circle are represented in the plan.		S		S
B. For each jurisdiction, has the local governing body adopted the plan?	Page vi	Each jurisdiction adopted the plan.		S		S
C. Is supporting documentation, such as a resolution, included for each participating jurisdiction?	Appendix A	The appropriate documentation was provided in the plan.		S		S
		SUMMARY SCORE		S		S

Multi-Jurisdictional Planning Participation

- Multihazard Requirement §201.6(a)(3): Multi-jurisdictional plans (e.g., watershed plans) may be accepted, as appropriate, as long as each jurisdiction has participated in the process ... Statewide plans will not be accepted as multi-jurisdictional plans.
- FMA Requirement §78.5(a): Description of the planning process and public involvement. Public involvement may include workshops, public meetings, or public hearings.

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	Location in the		STAFF	ORD	FN	ИΑ
Element	Plan (section or annex and page #)	Reviewer's Comments	NOT MET	MET	NOT MET	MET
A. Does the plan describe how each jurisdiction participated in the plan's development?	Page 2-2	Key participants in the planning process are outlined in Chapter 2 of the plan. For each participant category, the role of the participants is described. Participants include: County Commissioners, Town of Circle, Steering Committee, General Public, County DES Coordinator, Consulting Team and Technical experts and others.		S		S
		SUMMARY SCORE		S		S

PLANNING PROCESS:

Documentation of the Planning Process

- Multihazard Requirement §201.6(b): An open public involvement process is essential to the development of an effective plan. In order to develop a more comprehensive approach to reducing the effects of natural disasters, the planning process shall include:
 - (1) An opportunity for the public to comment on the plan during the drafting stage and prior to plan approval;
 - (2) An opportunity for neighboring communities, local and regional agencies involved in hazard mitigation activities, and agencies that have the authority to regulate development, as well as businesses, academia and other private and non-profit interests to be involved in the planning process; and
 - $(3) \ \textit{Review and incorporation, if appropriate, of existing plans, studies, reports, and technical information.}$
- Multihazard Requirement §201.6(c)(1): [The plan shall document] the planning process used to develop the plan, including how it was prepared, who was involved in the process, and how the public was involved.
- FMA Requirement §78.5(a): Description of the planning process and public involvement. Public involvement may include workshops, public meetings, or public hearings.

	l a sation in the			SCO	RE	
	Location in the Plan (section or		STAFFO	ORD	FN	1A
Element	annex and page #)	Reviewer's Comments	N	S	N	S
Does the plan provide a narrative description of the process followed to prepare the plan?	Pages 2-2, 2-12 to 2-24	Four basic elements (meetings) of the planning process are highlighted in the plan. They included: (1) Getting started – understanding the purpose and need for the plan. (2) Public Involvement and Outreach, (3) Plan Document Development and Review, and (4) Plan Approval. In addition, meeting summaries are provided that explain what occurred at the four planning meetings.		S		Ø
B. Does the plan indicate who was involved in the planning process? (For example, who led the development at the staff level and were there any external contributors such as contractors? Who participated on the plan committee, provided information, reviewed drafts, etc.?)	Pages 2-2 to 2-6	The participants and who was invited to participate in the planning process are described in Chapter 2 of the plan. External contributors invited to participate in the planning process included businesses and non-profit institutions.		S		S
C. Does the plan indicate how the public was involved? (Was the public provided an opportunity to comment on the plan during the drafting stage and prior to the plan approval?)	Pages 2-2 to 2-6; 2-31 to 2-41	The ads, correspondence and newspaper articles used to invite members of the public are provided in the plan in Chapter 2.		S		S
D. Was there an opportunity for neighboring communities, agencies, businesses, academia, nonprofits, and other interested parties to be involved in the planning process?	Pages 2-2 to 2-6 and 2-31 to 2-41	Other interested parties were included in the invitation to participate through news ads, articles and flyers. It was noted that businesses and non-profits were also included on the invitation list.		S		S
Does the planning process describe the review and incorporation, if appropriate, of existing plans, studies, reports, and technical information?	Page 1-12; Pages 3-1, 3-38 and 3-39	The list of sources after Chapter 1, Chapter 3 and Chapter 5 includes existing plans, studies and other technical information, and indicates that this information was reviewed and incorporated into the plan. The methodology explained on page 3-1 indicates that researching other plans and reports was part of the risk assessment.		Ø		Ø
		SUMMARY SCORE		S		S

RISK ASSESSMENT: $\S 201.6(c)(2)$: The plan shall include a risk assessment that provides the factual basis for activities proposed in the strategy to reduce losses from identified hazards. Local risk assessments must provide sufficient information to enable the jurisdiction to identify and prioritize appropriate mitigation actions to reduce losses from identified hazards.

Identifying Hazards

- Multihazard Requirement §201.6(c)(2)(i): [The risk assessment shall include a] description of the type ... of all natural hazards that can affect the jurisdiction.
- FMA Requirement §78.5(b): Description of the existing flood hazard and identification of the flood risk, including estimates of the number and type of structures at risk, repetitive loss properties, and the extent of flood depth and damage potential.

	Location in the		SCORE			
	Plan (section or		STAF	FORD	FN	
Element	annex and page #)	Reviewer's Comments	N	S	N	S
A. Does the plan include a description of the types of all natural hazards that affect the jurisdiction? If the hazard identification omits (without explanation) any hazards commonly recognized as threats to the jurisdiction, this part of the plan cannot receive a Satisfactory score. Consult with the State Hazard Mitigation Officer to identify applicable hazards that may occur in the planning area.	Pages 3-1 to 3-5 Table 3.1	Each hazard type highlighted in the plan provides a description of the type of event. The plan includes information on historical occurrences and SHELDUS is referenced as a resource for this plan, in particular for property damage assessments. The plan indicates that the plan's Steering Committee felt SHELUS estimates did not reflect reality and were low. Refer to (www.sheldus.org) for more information. The on-line resource indicates that McCone County, Montana does not have a Flood Insurance Study (FIS); however the plan indicates that Circle is participating in the NFIP. Refer to http://msc.fema.gov/ for additional information. National Inventory of Dams (NID) at http://crunch.tec.army.mil/nid/webpages/nid.cfm (introduction and download dam data) for National Dam Inventory information indicates one high hazard dam — the Fort Peck Dam in Nashua on the Missouri River as stated in the plan on page 3-22. The files indicate this dam has an emergency action plan in place as required by the national dam act. Online EPA data suggests that there are no toxic release inventory sites in McCone County. Please see http://www.epa.gov/triexplorer/ for more information. However the plan does talk about fixed facilities for hazardous materials in the county on page 3-24. Another consideration that should be evaluated is the scour potential for County bridges. Providing the names and locations of bridges with critical scour potential would enhance this plan.		Ø		Ø
		SUMMARY SCORE		S		S

Profiling Hazards

- Multihazard Requirement §201.6(c)(2)(i): [The risk assessment shall include a] description of the ... location and extent of all natural hazards that can affect the jurisdiction. The plan shall include information on previous occurrences of hazard events and on the probability of future hazard events.
- FMA Requirement §78.5(b): Description of the existing flood hazard and identification of the flood risk,, and the extent of flood depth and damage potential.

	Location in the			SCC	RE	
	Location in the Plan (section or		STAF	FORD	F۱۷	IΑ
Element	annex and page #)	Reviewer's Comments	N	S	N	S
A. Does the risk assessment identify the location (i.e., geographic area affected) of each natural hazard addressed in the plan?	Pages 3-6 to 3- 31	The location and extent of past events is described for each hazard type evaluated in the plan.		S		S
B. Does the risk assessment identify the extent (i.e., magnitude or severity) of each hazard addressed in the plan?	Pages 3-6 to 3- 31	The extent and magnitude of hazards is presented in the plan. Descriptions of past events and cost estimates for the associated damage are provided for most hazards.		S		S
C. Does the plan provide information on previous occurrences of addressed in the each hazard plan?	Pages 3-6 to 3- 31	The historic occurrences for each hazard assessed are outlined in the plan and described in detail.		S		S

D. Does the plan include the probability of future events (i.e., chance of occurrence) for each hazard addressed in the plan?	The frequency of past events was evaluated by the plan's Steering Committee and determined the probability of future occurrences as moderate to hig high, moderate, minimal or low. Probabilities were as follows: Low = 0-1 major incidents in a 5-year period. Moderate = 2-9 incidents in a 5-year period. High = 10 or more incidents in a 5-year period. Clarified in an email to regional office. Probability for drought was rated as continued probability; Winter storms rated high to moderate probability, Summer storms high probability, Floods moderate to high probability. No probability for hazardous materials spills or for insect infestations disease. Relatively low and minimal for earthquake and volcano respectively. Recommended Revisions for the Five Year Update: Note any data limitations for profiling hazards and include in the mitigation strategy actions for collecting the data to complete and improve future risk analysis efforts. For more information on profiling hazards, see Understanding Your Risks (FEMA 386-2), Step 2.	n,	Ø
	SUMMARY SCOR	E S	S

Jurisdiction: McCONE COUNTY, MONTANA

Assessing Vulnerability: Overview

- Multihazard Requirement $\S 201.6(c)(2)(ii)$: [The risk assessment shall include a] description of the jurisdiction's vulnerability to the hazards described in paragraph (c)(2)(i) of this section. This description shall include an overall summary of each hazard and its impact on the community.
- FMA Requirement §78.5(b): Description of the existing flood hazard and identification of the flood risk,, and the extent of flood depth and damage potential.

	Location in the		<u> </u>	SCC	DRE	
	Location in the Plan (section or		STAFI	FORD	F۱	/IA
Element	annex and page #)	Reviewer's Comments	N	S	N	S
A. Does the plan include an overall summary description of the jurisdiction's vulnerability to each hazard?	Pages 3-6 to 3- 31	For each hazard assessed, there is a section describing vulnerability and potential loss estimates. These describe the types of impacts/losses to services and structural damage than can occur and attempts to assign costs to the potential losses when information is available.		S		S
B. Does the plan address the impact of each hazard on the jurisdiction?	Pages 3-6 to 3- 31	For each hazard assessed, there is a section describing vulnerability and potential loss estimates. These describe the types of impacts/losses to services and the structural damage than can occur.		S		S
		SUMMARY SCORE		S		S

Assessing Vulnerability: Identifying Structures

- Multihazard Requirement §201.6(c)(2)(ii)(A): The plan should describe vulnerability in terms of the types and numbers of existing and future buildings, infrastructure, and critical facilities located in the identified hazard area
- FMA Requirement §78.5(b): Description of the existing flood hazard and identification of the flood risk, including estimates of the number and type of structures at risk, repetitive loss properties,....

	Location in the			SCO	RE	
	Location in the Plan (section or		STAI	FFORD	F۱	/IA
Element	annex and page #)	Reviewer's Comments	N	S	N	S
A. Does the plan describe vulnerability in terms of the types and numbers of existing buildings (including repetitive loss structures), infrastructure, and critical facilities located in the identified hazard areas?	Pages 3-32 to 3-35	The plan does provide a discussion on existing infrastructure and critical facilities, but does not specifically identify the structures within hazard prone areas. On page 3-32, the hazard prone areas are stated to be the whole county, except for floodplain areas designated in the town of Circle. For future submissions, the hazard prone areas by hazard type need to be identified as not all hazards have the same potential impact.	Z		N/A	

		Recommended Revisions: For [specify hazard or hazards], identify the type and number of existing buildings, infrastructure, and critical facilities within each hazard area. Additional Suggestions: Identify the kinds of buildings (e.g., residential, commercial, institutional, recreational, industrial, and municipal), infrastructure (e.g., roadways, bridges, utilities, and communications systems), and critical			
		facilities (e.g., shelters, hospitals, police, and fire stations). Describe the process or method used for identifying existing buildings, infrastructure, and critical facilities. If limited data are available, focus on identifying critical facilities located in the identified hazard areas and identify the collection of data for the remaining buildings and infrastructure as an action item in the mitigation strategy. It is useful to inventory structures located within areas that have repeatedly flooded and collect information on past insurance claims. At a minimum, describe repetitive loss neighborhoods or areas in the plan. For a discussion on identifying vulnerable structures and detailed inventories, see <i>Understanding Your Risks</i> (FEMA 386-2), Step 3, Worksheet #3a and #3b, Inventory Assets.			
D. Doog the plan describe and constitution to the	Daniel 4 5 to 4 7	Note: A "Needs Improvement" score on this requirement will not preclude the Stafford plan from passing.			
B. Does the plan describe vulnerability in terms of the types and numbers of future buildings, infrastructure, and critical facilities located in the identified hazard areas?	Pages 1-5 to 1-7	The plan provides a discussion on land use and development trends, but does not specifically describe vulnerability in terms of future buildings. The plan does state that the county has not adopted a growth policy or comprehensive plan at this time. The agricultural industry increased between 1990 and 2000. The only anticipated major development is a potential coal mine north of Circle. Recommended Revisions: For [specify hazard or hazards], identify the type and number of future	N	Z	
		buildings, infrastructure, and critical facilities within each hazard area.			

Additional Suggestions:			
Identify the types of buildings (e.g., residential, commercial, institutional, recreational, industrial, and municipal buildings), infrastructure (e.g., roadways, bridges, utilities, and communications systems), and critical facilities (e.g., shelters, hospitals, police, and fire stations). Information on proposed buildings, infrastructure, and critical facilities, including planned and approved development, may be based on information in the comprehensive or land use plan and zoning maps. Identify buildings, infrastructure, and critical facilities that are vulnerable to more than one hazard. Describe the process or method used for identifying future buildings, infrastructure, and critical facilities. Note any data limitations for determining the type and numbers of future buildings, infrastructure, and critical facilities and include in the mitigation strategy actions for collecting the data to improve future vulnerability assessment efforts. For a discussion on identifying vulnerable structures and detailed inventories, see <i>Understanding Your Risks</i> (FEMA 386-2), Step 3, Worksheet #3a and #3b, Inventory Assets.			
Note: A "Needs Improvement" score on this requirement will not preclude the plan from passing.			
SUMMARY SCORE	N	N	

Assessing Vulnerability: Estimating Potential Losses

• Multihazard Requirement $\S 201.6(c)(2)(ii)(B)$: [The plan should describe vulnerability in terms of an] estimate of the potential dollar losses to vulnerable structures identified in paragraph (c)(2)(i)(A) of this section and a description of the methodology used to prepare the estimate

			SCORE			
	Location in the Plan (section or		STAF	FORD	FM	Α
Element	annex and page #)	Reviewer's Comments	N	S	N	S
A. Does the plan estimate potential dollar losses to vulnerable structures?	Pages 3-6 to 3- 31	The risk assessment portion of the plan, Chapter 3 provides potential dollar losses for hazard types for most hazards. However, all hazards are recommended to have cost estimates provided.				
		Recommended Revisions: Describe vulnerability in terms of potential dollar losses.				
		Additional Suggestions:				
		Provide an estimate for each identified hazard. When resources permit, include estimates for structure, contents, and function losses to present a				
		full picture of the total loss for each building, infrastructure, and critical facility. Select the most likely event for each identified hazard (e.g., 100-year flood) and estimate the likely losses associated with this event. Include a composite loss map to locate high potential loss areas to help the jurisdiction focus its mitigation priorities. Note any data limitations for estimating losses and include in the mitigation strategy actions for collecting the data to improve future loss estimate efforts. For a step-bystep method for estimating losses, see <i>Understanding Your Risks</i> (FEMA 386-2), Step 4.	N		Z	
		Note: A "Needs Improvement" score on this requirement will not preclude the plan from passing.				

B. Does the plan describe the methodology used to prepare the estimate?	Pages 3-6 to 3- 31	For hazards that have cost estimates associated with them the source or method used to calculate them is provided. The plan needs to provide cost estimates for all hazards assessed to meet this recommendation. Recommended Revisions for the Five Year Update: Describe the methodology used to estimate losses. For a step-by-step method for estimating losses, see Understanding Your Risks (FEMA 386-2), Step 4. Note: A "Needs Improvement" score on this requirement will not preclude the plan from passing.	N	N	
		SUMMARY SCORE	Ν	N	

Assessing Vulnerability: Analyzing Development Trends

• Multihazard Requirement §201.6(c)(2)(ii)(C): [The plan should describe vulnerability in terms of] providing a general description of land uses and development trends within the community so that mitigation options can be considered in future land use decisions.

	Location in the			SC0	CORE		
	Plan (section or		STAI	FFORD	F۱	ΛA	
Element	annex and page #)	Reviewer's Comments	N	S	N	S	
A. Does the plan describe land uses and development trends?	Pages 1-5 to 1-7	The plan provides a discussion on land use and development trends, The plan does state that the county has not adopted a growth policy or comprehensive plan at this time. The agricultural industry increased between 1990 and 2000. The only anticipated major development in the county is a potential coal mine north of Circle. Note: A "Needs Improvement" score on this requirement will not preclude the plan from passing.		Ø		Ø	
		SUMMARY SCORE		S		S	

Multi-Jurisdictional Risk Assessment

- Multihazard Requirement §201.6(c)(2)(iii): For multi-jurisdictional plans, the risk assessment must assess each jurisdiction's risks where they vary from the risks facing the entire planning area.
- **FMA FEMA 299 Guidance:** The Plan should be coordinated with, and ideally developed in cooperation with, all of the local jurisdictions within the geographical area.

				SCO	RE	
	Location in the		STAF	FFORD	F۱۷	/IA
Element	Plan (section or annex and page #)	Reviewer's Comments	N	S	N	S
A. Does the plan include a risk assessment for each participating jurisdiction as needed to reflect unique or varied risks?	Pages 3-6 to 3-31, Page 3-32; page 4-2	The risk assessments include the town of Circle when impacts of hazards potentially impact the town, in particular, in the historical occurrences section of the assessments. On page 3-32, as well as on page 4-2, the plan indicates how Circle differs in terms of hazard impacts from the rest of the county. Note: A "Needs Improvement" score on this requirement will not preclude the FMA plan from passing.		Ø		S
		SUMMARY SCORE		S		S

MITIGATION STRATEGY: $\S 201.6(c)(3)$: The plan shall include a mitigation strategy that provides the jurisdiction's blueprint for reducing the potential losses identified in the risk assessment, based on existing authorities, policies, programs and resources, and its ability to expand on and improve these existing tools.

Local Hazard Mitigation Goals

- Multihazard Requirement §201.6(c)(3)(i): [The hazard mitigation strategy shall include a] description of mitigation goals to reduce or avoid long-term vulnerabilities to the identified hazards.
- FMA Requirement §78.5(c): The applicant's floodplain management goals for the area covered by the plan.

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	Location in the Plan (section or		STAF	FORD	FN	ΛA
Element	annex and page #)	Reviewer's Comments	N	S	N	S
A Does the plan include a description of mitigation goals to reduce or avoid long-term vulnerabilities to the identified hazards? (GOALS are long-term; represent what the community wants to achieve, such as "eliminate flood damage"; and are based on the risk assessment findings.)	Pages 4-1 to 4-5	The plan identifies six wide ranging mitigation goals. However the probability of hazards was not always considered when ranking priority for their mitigation actions. For example: Probability for drought was rated as continued probability but rated as a high priority for mitigation projects; a potential for hazardous materials spills was provided, but had high rated projects for potential hazard spills. Goals included projects to assist for power outages – this hazard event was not assessed. Recommended Revisions for the Five Year Update: Consider including goals based on the risk assessment findings. For more information on developing local mitigation goals and objectives, see Developing the Mitigation Plan (FEMA 386-3), Step 1.		S		S
		SUMMARY SCORE		S		S

Identification and Analysis of Mitigation Actions

- Multihazard Requirement §201.6(c)(3)(ii): [The mitigation strategy shall include a] section that identifies and analyzes a comprehensive range of specific mitigation actions and projects being considered to reduce the effects of each hazard, with particular emphasis on new and existing buildings and infrastructure.
- FMA Requirement §78.5(d): *Identification and evaluation of cost-effective and technically feasible mitigation actions considered.*

				SCO	RE	
	Location in the Plan (section or		STAFF	ORD	F۱	lΑ
Element	annex and page #)	Reviewer's Comments	N	S	N	S
A. Does the plan identify and analyze a comprehensive range of specific mitigation actions and projects for each hazard?	Pages 4-2 to 4-7	While there is a wide range of projects listed as mitigation, most of these activities are Preparedness and Response items. These activities are important to the community, which is good. However, if one of the intents of this plan is to be eligible for FEMA funding of mitigation projects, one must have eligible project types identified in the plan in order to participate in such funding.		S		Ø
B Do the identified actions and projects address reducing the effects of hazards on new buildings and infrastructure?	Pages 4-2 to 4-7	Although there is little new construction going on, participation in the NFIP would aid in protecting both new and existing buildings and infrastructure. Note: A "Needs Improvement" score on this requirement will not preclude the FMA plan from passing.		S		S
C. Do the identified actions and projects address reducing the effects of hazards on existing buildings and infrastructure?	Pages 4-2 to 4-7	Participation in the NFIP would aid in protecting both new and existing buildings and infrastructure.		S		s
		SUMMARY SCORE		S		S

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Jurisdiction: McCONE COUNTY, MONTANA

Implementation of Mitigation Actions

- Multihazard Requirement: §201.6(c)(3)(iii): [The mitigation strategy section shall include] an action plan describing how the actions identified in section (c)(3)(ii) will be prioritized, implemented, and administered by the local jurisdiction. Prioritization shall include a special emphasis on the extent to which benefits are maximized according to a cost benefit review of the proposed projects and their associated costs.
- FMA Requirement §78.5(d): Identification and evaluation of cost-effective and technically feasible mitigation actions considered; and

• **FMA Requirement §78.5(e):** Presentation of the strategy for reducing flood risks and continued compliance with the NFIP, and procedures for ensuring implementation, reviewing progress, and recommending revisions to the plan.

	Location in the			SCO	RE	
	Plan (section or		STAFF	ORD	FN	1A
Element	annex and page #)	Reviewer's Comments	N	S	N	S
A. Does the mitigation strategy include how the actions are prioritized ? (For example, is there a discussion of the process and criteria used?)	Pages 4-6 and 4-7	The projects are ranked by high, medium, and low without any order to them. Putting them in order of importance would enhance the plan. Note: A "Needs Improvement" score on this requirement will not preclude the FMA plan from passing.		S		S
B. Does the mitigation strategy address how the actions will be implemented and administered ? (For example, does it identify the responsible department, existing and potential resources, and timeframe?)	Pages 4-7 to 4- 10; Pages 5-22 and 5-23.	Implementation of mitigation actions is described in the plan. The LEPC and the County DES Coordinator will be responsible for implementation. Table on 4-9 and 4-10 provide time frame comparative cost, and benefits. Potential funding sources are described generally on pages 4-7 and 4-8. A table was sent in separate correspondence clarifying this element.		Ø		Ø
B.1. Does the mitigation strategy address continued compliance with the NFIP?	Pages 4-7 to 4- 10	Participation in the NFIP is a mitigation goal for the county. Note: A "Needs Improvement" score on this requirement will not preclude the Stafford plan from passing.		S		S
C. Does the prioritization process include an emphasis on the use of a cost-benefit review (see page 3-36 of <i>Multi-Hazard Mitigation Planning Guidance</i>) to maximize benefits?	Page 4-8	The plan shows a table that provides costs versus benefits. Note: A "Needs Improvement" score on this requirement will not preclude the FMA plan from passing.		S		S
C.1. Does the mitigation strategy emphasize cost- effective and technically feasible mitigation actions?	Page 4-8	See above. Note: A "Needs Improvement" score on this requirement will not preclude the Stafford plan from passing.		S		S
		SUMMARY SCORE		S		S

Multi-Jurisdictional Mitigation Actions

- Multihazard Requirement §201.6(c)(3)(iv): For multi-jurisdictional plans, there must be identifiable action items specific to the jurisdiction requesting FEMA approval or credit of the plan.
- **FMA FEMA 299 Guidance:** The Plan should be coordinated with, and ideally developed in cooperation with, all of the local jurisdictions within the geographical area.

	Location in the			SCC	RE	
	Location in the Plan (section or		STAFF	ORD	FN	IA
Element	annex and page #)	Reviewer's Comments	N	S	N	S
A Does the plan include at least one identifiable action item for each jurisdiction requesting FEMA approval of the plan?	Pages 4-8 and 4- 9	While most of the mitigation measures are county- wide items, there is a specific measure for the Town of Circle.		S		S
		SUMMARY SCORE		S		S

PLAN MAINTENANCE PROCESS

Monitoring, Evaluating, and Updating the Plan

- Multihazard Requirement §201.6(c)(4)(i): [The plan maintenance process shall include a] section describing the method and schedule of monitoring, evaluating, and updating the mitigation plan within a five-year cycle.
- **FMA Requirement §78.5(e):** Presentation of the strategy for reducing flood risks and continued compliance with the NFIP, and procedures for ensuring implementation, reviewing progress, and recommending revisions to the plan.

	Location in the			SCO	RE	
	Location in the Plan (section or		STAFF	ORD	F۱	ΛA
Element	annex and page #)	Reviewer's Comments	N	S	N	S
A. Does the plan describe the method and schedule for monitoring the plan? (e.gdoes it identify the party responsible for monitoring and include a schedule for reports, site visits, phone calls, and meetings?)	Pages 6-1 and 6-2	The McCone County Commissioners will be responsible for ensuring maintenance of the plan. Delegated the on-going responsibility to the McCone County DES Coordinator and the LEPC chairman.		S		Ø
B. Does the plan describe the method and schedule for evaluating the plan? (For example, does it identify the party responsible for evaluating the plan and include the criteria used to evaluate the plan?)	Pages 6-1 and 6-2	Plan review will occur each January by the LEPC, unless a review trigger occurs earlier. Circle Banner will invite the public to these annual meetings. Comments will be filed by DES coordinator.		S		S
C. Does the plan describe the method and schedule for updating the plan within the five-year cycle?	Pages 6-1 and 6-2	Every five years the plan will be updated and submitted to the Montana DES and subsequently to FEMA for approval. Note: A "Needs Improvement" score on this requirement will not preclude the FMA plan from passing.		S		Ø
		SUMMARY SCORE		S		S

Incorporation into Existing Planning Mechanisms

• Multihazard Requirement §201.6(c)(4)(ii): [The plan shall include a] process by which local governments incorporate the requirements of the mitigation plan into other planning mechanisms such as comprehensive or capital improvement plans, when appropriate.

	Location in the			SCO	RE	
	Location in the Plan (section or		STAFF	ORD	FN	1A
Element	annex and page #)	Reviewer's Comments	N	S	N	S
A. Does the plan identify other local planning mechanisms available for incorporating the requirements of the mitigation plan?	Page 6-2	Incorporation into other plans is described on page 6-2. Plan projects will be incorporated into existing plans, annual budgets and any growth policy that may be developed for the county or town. A matrix was provided to delineate the various plans impacted.		S		S
B. Does the plan include a process by which the local government will incorporate the requirements in other plans, when appropriate?	Page 6-2	Incorporation into other plans is described on page 6-2. Plan projects will be incorporated into existing plans, annual budgets and any growth policy that may be developed for the county or town. A matrix was provided to delineate the various plans impacted.		Ø		S
		SUMMARY SCORE		S		S

Continued Public Involvement

• Multihazard Requirement §201.6(c)(4)(iii): [The plan maintenance process shall include a] discussion on how the community will continue public participation in the plan maintenance process.

				SCO	RE	
	Location in the		STAFF	ORD	F۱	/IA
Element	Plan (section or annex and page #)	Reviewer's Comments	N	S	N	S
A. Does the plan explain how continued public participation will be obtained? (For example, will there be public notices, an on-going mitigation plan committee, or annual review meetings with stakeholders?)	Pages 6-1 and 6-2	Annual meetings of the LEPC/Public will be advertised in the Circle Banner. The Steering Committee members will be encouraged to attend. Note: A "Needs Improvement" score on this requirement will not preclude the FMA plan from passing.		S		S
		SUMMARY SCORE		S		S

Matrix A: Profiling Hazards

This matrix can assist FEMA and the State in scoring each hazard. Local jurisdictions may find the matrix useful to ensure that their plan addresses each natural hazard that can affect the jurisdiction. **Completing the matrix is not required**.

Note: First, check which hazards are identified in requirement §201.6(c)(2)(i). Then, place a checkmark in either the N or S box for each **applicable** hazard. An "N" for any element of any identified hazard will result in a "Needs Improvement" score for this requirement. List the hazard and its related shortcoming in the comments section of the Plan Review Crosswalk.

Hazard Type	Hazards Identified Per Requirement §201.6(c)(2)(i)	A. Lo	cation	B. E	xtent	C. Pre Occur	evious rences	D. Probability of Future Events		
	Yes	N	S	N	S	N	S	N	S	
Avalanche										
Coastal Erosion										
Coastal Storm										
Dam Failure			\Box							
Drought										
Earthquake										
Expansive Soils										
Extreme Heat			\Box							
Flood										
Hailstorm			\Box							
Hurricane										
Land Subsidence										
Landslide										
Severe Winter Storm			\Box							
Tornado										
Tsunami										
Volcano										
Wildfire		一百	Π				一		一百二	
Windstorm		Ħ	Ħ							
Other		Π								
Other		Π								
Other										



Legend:

§201.6(c)(2)(i) Profiling Hazards

- A. Does the risk assessment identify the location (i.e., geographic area affected) of each hazard addressed in the plan?
- B. Does the risk assessment identify the extent (i.e., magnitude or severity) of each hazard addressed in the plan?
- C. Does the plan provide information on previous occurrences of each natural hazard addressed in the plan?
- D. Does the plan include the probability of future events (i.e., chance of occurrence) for each hazard addressed in the plan?

To check boxes, double

click on the box and change the default value to "checked."

Jurisdiction: McCONE COUNTY, MONTANA

Matrix B: Assessing Vulnerability

This matrix can assist FEMA and the State in scoring each hazard. Local jurisdictions may find the matrix useful to ensure that their plan addresses each requirement. Completing the matrix is not required.

Note: First, check which hazards are identified in requirement §201.6(c)(2)(i). Then, place a checkmark in either the N or S box for each applicable hazard. An "N" for any element of any identified hazard will result in a "Needs Improvement" score for this requirement. List the hazard and its related shortcoming in the comments section of the Plan Review Crosswalk.

Note: Receiving an N in the shaded columns will not preclude the plan from passing.

Hazard Type	Hazards Identified Per Requirement §201.6(c)(2)(i)		Sun Descr	Overall nmary iption of erability	lm	lazard pact	Structures	Num Exis Struct Hazar	oes and ber of sting ures in d Area mate)	Fut Struct Hazar (Estir	per of ture tures in d Area mate)	Potential Losses	A. Loss	Estimate		odology
	Yes		<u>N</u>	<u></u>	N	<u></u>	달	<u>N</u>	<u>s</u>	N	S	<u>a</u>	<u>N</u>	<u>s</u>	<u>N</u>	<u>s</u>
Avalanche		iev	Ш				Ĕ					ä				
Coastal Erosion		erv										ğ				
Coastal Storm		Overview					Ş					9 P				
Dam Failure							ntif					Ë				
Drought		i i					Identifying					E.				
Earthquake		rak										Estimating				
Expansive Soils		Vulnerability:					l ≝									
Extreme Heat		^n					l ab					<u> </u>				
Flood		Assessing					Vulnerability:					Vulnerability:				
Hailstorm		SS					Ĭ					ne				
Hurricane		SSE					ng					\ N				
Land Subsidence		Α (Assessing					ng				
Landslide		2)(ii					sse					ssi				
Severe Winter Storm		c)(2										Assessing				
Tornado		§201.6(c)(2)(ii)					.6(c)(2)(ii)									
Tsunami		201				\Box	🔅									\Box
Volcano		S					9.)(2				
Wildfire			\Box			\Box	\$201.				\Box	.6(c)(2)(ii)				
Windstorm							ίδη					\$201.				
Other												S				
Other																
Other																

§201.6(c)(2)(ii) Assessing Vulnerability: Overview

- A. Does the plan include an overall summary description of the jurisdiction's vulnerability to each hazard?
- B. Does the plan address the impact of each hazard on the jurisdiction?

§201.6(c)(2)(ii)(A) Assessing Vulnerability: Identifying Structures

A. Does the plan describe vulnerability in terms of the types and numbers of existing buildings, infrastructure, and critical facilities located in the identified hazard areas?

B. Does the plan describe vulnerability in terms of the types and numbers of future buildings, infrastructure, and critical facilities located in the identified hazard areas?

§201.6(c)(2)(ii)(B) Assessing Vulnerability: Estimating Potential Losses

- A. Does the plan estimate potential dollar losses to vulnerable structures?
- B. Does the plan describe the methodology used to prepare the estimate?

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Matrix C: Identification and Analysis of Mitigation Actions

This matrix can assist FEMA and the State in scoring each hazard. Local jurisdictions may find the matrix useful to ensure consideration of a range of actions for each hazard. **Completing the matrix is not required.**

Note: First, check which hazards are identified in requirement §201.6(c)(2)(i). Then, place a checkmark in either the N or S box for each **applicable** hazard. An "N" for any identified hazard will result in a "Needs Improvement" score for this requirement. List the hazard and its related shortcoming in the comments section of the Plan Review Crosswalk.

Hazard Type	Hazards Identified Per Requirement §201.6(c)(2)(i)	A. Comprehensive Range of Actions and Projects
A I I	Yes	N S
Avalanche		
Coastal Erosion		
Coastal Storm		
Dam Failure		
Drought		
Earthquake		
Expansive Soils		
Extreme Heat		
Flood		
Hailstorm		
Hurricane		
Land Subsidence		
Landslide		
Severe Winter Storm		
Tornado		
Tsunami		
Volcano		
Wildfire		
Windstorm		
Other		
Other		
Other		



Legend:

§201.6(c)(3)(ii) Identification and Analysis of Mitigation Actions

A. Does the plan identify and analyze a comprehensive range of specific mitigation actions and projects for each hazard?